

TRANSMISSION REPORT

08.08.1997 12:15

DATE TIME	DURATION	REMOTE ID	MODE	PAGES	RESULT
08.08 12:13	01'40"	917145631330	ECM	04	O.K.

TRANSMISSION REPORT

08.08.1997 12:12

DATE TIME	DURATION	REMOTE ID	MODE	PAGES	RESULT
08.08 12:06	05'51"	914155127014	ECM	04	O.K.

RESALE SERVICE REQUEST - ADMINISTRATIVE INFORMATION

USE FOR ALL REQUESTS

PON: 1591954 VER: 111

DESCRIPTION OF REQUEST

REQUEST TYPE

- ☒ INITIAL
☐ SUPPLEMENT
☐ CANCEL

PREPARER INFORMATION

PREPARER NAME: Darlene Didicks
 PREPARER TELEPHONE NO: 714-864-3122 X

SENT TO LISC

DATE: 08-11-1997
 TIME: 01:30 AM/PM

(PACIFIC STANDARD TIME)

SERVICE CATEGORY CODE: B

B = BASIC EXCHANGE

P=PBX

N=COPT

Enter activity type code:

RESIDENCE ACTIVITY TYPE CODE ☐

BUSINESS ACTIVITY TYPE CODE ☒

N = NEW SERVICE/ADDITIONAL LINE

C = CHANGE EXISTING LINE

T = OUTSIDE MOVE ADDRESS

X = MIGRATION AS IS

D = DISCONNECT SERVICE OR LINES

(tel no, service type, features, hunting)

R = RECORDS ONLY CHANGE (e911, listing)

Z = MIGRATION AS SPECIFIED

S = SUSPEND

U = UNPAID DISCONNECT

A = ACTIVATE SUSPENDED ACCOUNT

NO. OF LINES/TRUNKS: 4 (250 max per request)

NO. OF HICAPS: 1 (99 max per request)

☐ AUTHORIZE PACIFIC BELL TO ASSIGN TELEPHONE NUMBER(S)

DESIRED DUE DATE AT SERVICE ADDRESS:

08-21-1997 AM/PM

PACIFIC BELL ORDER NUMBER: 11111111

DESIRED DISCONNECT DATE AT OLD SERVICE ADDRESS:

11-11-1997 AM/PM

ADVANCE TEL. NUMBER: 11111111

☐ EXPEDITE DUE DATE

EXPEDITE REASON:

EXISTING DATA

☐ INCLUDED IN THIS REQUEST

☐ SENT VIA LISTING GATEWAY

☐ NOT APPLICABLE FOR THIS REQUEST

☒ AS IS

RESELLER INFORMATION

PROJECT ID: 11111111

RPN: 11111111

RORD: 11111111

RESELLER ID: 7245

RESELLER ACNA: 126

RESELLER OCN: 7245

RESELLER NAME: 11111111

RESELLER BAN/

SUMMARY BTN: 11111111

CONTACT NAME: Darlene Didicks

TEL NO: 714-864-3122 X

EMAIL ADDRESS: 11111111

FAX NO: 714-864-3122

LTR OF AUTH NAME: Roy Ringwood

LTR OF AUTH DATE: 08-01-1997

PACIFIC BELL USE ONLY

RECEIVED
AT LISC

DATE: 11-11-1997

TIME (PST): 11:11 AM/PM

MODE REQUEST

☐ FAX

☐ MAIL

☐ EXPRESS MAIL

RECEIVED:

☐ PHONE

☐ OTHER

LOGGED 9Y:

PACIFIC BELL DUE DATE: 11-11-1997

T-176 P.06/06 Job-471

[illegible]

<input checked="" type="checkbox"/> SERIES	<input type="checkbox"/> CIRCULAR	<input type="checkbox"/> PREFERENTIAL	<input type="checkbox"/> MULTI-LINE	<input type="checkbox"/> STOP HUNT	<input type="checkbox"/> MAKE BUSY
--	-----------------------------------	---------------------------------------	-------------------------------------	------------------------------------	------------------------------------

11-11-11

NEW LEAD NUMBER:

SECRET

☐ REMOVE ENTIRE HUNT GROUP/LINES REMAIN IN SERVICE

HUNT GROUP #: 111

Form 517 Version 7

Resale Service Issues

- ICG has experienced an incident where Pacific Bell changed an ICG business local exchange resale customer from ICG back to Pacific Bell without the customer ever requesting to go back to Pacific Bell. Additionally, Pacific Bell never had a Letter of Agency authorizing such changes. In fact, Pacific Bell attempted to keep the customer on Pacific Bell local exchange service by crediting the customer's Pacific Bell account all non-recurring charges associated with the change back to Pacific Bell business line service. In order to return the customer to ICG, and after obtaining a letter from the customer (attached), ICG was forced to escalate the incident to senior executive Pacific Bell management as well as re-execute Automated Service Requests. Further more, Pacific Bell improperly reassessed to ICG non-recurring change over charges associated with returning the customer to its carrier of choice, ICG, in which case ICG had to fight Pacific Bell to have the second set of non-recurring charges removed.

Documentation: Tab 4 - Customer letter from Sheet Metal Workers International Association.

- Pacific Bell frequently loses all local exchange service when migrating customers from Pacific Bell to ICG. Generally, service outage times average from four hours to 24+ hours.

Documentation: Tab 5 - Customer letter from AAA Flag & Banner Manufacturing Company Incorporated.

- Pacific Bell's poor OSS and LISC service cause CLC end-user customers to form a poor image of CLCs when reselling Pacific Bell loops. In fact, Sprint has filed an Advice Letter with the CPUC requesting to "grandfather" Pacific Bell resold local residential services.

Documentation: Tab 6 - Copy of Sprint Telecom. Ventures Advice Letter No. 44 and Statements of William Harrelson, counsel for MCI, and William Ettinger, counsel for AT&T, in IECs' complaint case against SBC/Pacific Bell explaining why IECs are no longer promoting resold services. AT&T Notice of Ex Parte Communication with CPUC, CPUC Case Numbers 96-12-026, 96-12-044, 97-02-021.



7/17/97

AAA FLAG AND BANNER MFG. CO., INC.

8955 National Boulevard, Los Angeles, CA 90034 Tel 310.836.3341 FAX 310.836.4144

SENT BY FAX AND MAIL

July 15, 1997**ICG TELECOM GROUP, INC.****Attention: Customer Service****5 Park Plaza Suite 1100****Irvine, California 92614****Dear I.C.G.:**

AAA FLAG & BANNER MFG. CO., INC., hereby gives you written notice of our intent to terminate your service at the following locations:

8923 National Blvd. L.A. 90034**8955 National Blvd. L.A. 90034****8966 National Blvd. L.A. 90034****8954 West Pico Blvd. L.A. 90035****1400 North Vine St. Hollywood 90028****1201 S. Broadway L.A. 90015****12709 S. Prairie Ave. Hawthorne 90250****14460 Ventura Blvd. Sherman Oaks 91423****113 10th St. San Francisco 94103**

Please coordinate the disconnection of services with Pacific

Bell. - 2 WRONG 411 LISTINGS

- 800 # REterm. (mcl)

- LOSS OF HUNT ON MAIN LOCATION

- DISCO. #

Please call me at 310-836-3341 with any questions.

Sincerely,

Carol F. Hettiger

Carol F. Hettiger

Controller

ICG Dial Tone Trouble Ticket

7/17/97 3:23:44 PM

AAA Flag & Banner CAL

8954 W. Pico Blvd. Los Angeles, Ca. 90035

Bus

☒ 7/15/97 4:15:55 PM

310-276-2574 gets disconnect recording, and customer says he did not disconnect this line.

I opened a ticket with Pac Bell Bill # 0014108 and he said the number was disconnected 2/23/97 and ICG migrated the number 3/7/97. Pac Bell is going to search the records on this disconnect order and call back.

BY: R.B

7/16 3:15PM - STATUS - PACBELL (KATHY) IS STILL RESEARCHING DISCONNECTED NUMBER

7/16 5:15PM - STATUS - PACBELL CONFIRMS DISCONNECTION POSSIBLE ERROR. RB FAXED TO KATHY THE PACBELL RESALE ACCESS LINE REQUEST COMPLETION AND CONFIRMATION SHEETS.

PENDING PACBELL RESPONSE

7/17 10am- FOLLOW - UP CALL MADE TO CUSTOMER TO GIVE STATUS

11AM - CALL PACBELL(KATHY X432) TO GET STATUS. REPOSE - UNABLE TO LOCATE FILE WITH PON#425. TROUBLE HAS BEEN TURN OVER TO LISC (CHUCK)

11:15AM VERIFY WITH ICG BILLING . REPOSE - CUSTOMER IS BEING BILL

11:30AM CALL PACBELL BILLING (CANDY). RESPONSE - ICG IS BEING BILLED FOR # AND RECORDS SHOW NUMBER IS IN-ACTIVE. GOT TRANSFERED TO ORDERS DEPARTMENT. (MARY LOU -POSITION 1 555).

RESPONSE - RECORDS SHOW ORDER WAS CANCELLED AND UNCLEAR CONDITIONS EXISTED.

TO CLEAR TROUBLE FAX TO ORDERS DEPARTMENT INFORMATION WITH PON#.

12:45 RECEIVED CALL FROM PACBELL(KATHY) - NUMBER WILL BE RE-ACTIVATED BY 5PM 7/17/97 PER PACBELL LISC (CHUCK).

310-276-2574-

Carol

-1

310-836-3341

Trouble Category

- Out of Ser ☐
- Serv Impaired ☒
- Repeat ☐
- On Net ☐
- On Swt ☐
- 911/411/O/PIC ☐
- Features ☐
- Cust Ser/Feat ☐
- CPE/PBX ☐

ICG TN or Resale ☒

Cause of Trouble

- TOK/NTF ☐
- CPE/PBX ☐
- Cust Mis Us ☐
- OSP ☐
- ICG SW HDW ☐
- ICG SW Trans ☐
- LEC SW HDW ☐
- LEC SW Trans ☐

Resale Service Issues

- ICG has experienced an incident where Pacific Bell changed an ICG business local exchange resale customer from ICG back to Pacific Bell without the customer ever requesting to go back to Pacific Bell. Additionally, Pacific Bell never had a Letter of Agency authorizing such changes. In fact, Pacific Bell attempted to keep the customer on Pacific Bell local exchange service by crediting the customer's Pacific Bell account all non-recurring charges associated with the change back to Pacific Bell business line service. In order to return the customer to ICG, and after obtaining a letter from the customer (attached), ICG was forced to escalate the incident to senior executive Pacific Bell management as well as re-execute Automated Service Requests. Further more, Pacific Bell improperly reassessed to ICG non-recurring change over charges associated with returning the customer to its carrier of choice, ICG, in which case ICG had to fight Pacific Bell to have the second set of non-recurring charges removed.

Documentation: Tab 4 - Customer letter from Sheet Metal Workers International Association.

- Pacific Bell frequently loses all local exchange service when migrating customers from Pacific Bell to ICG. Generally, service outage times average from four hours to 24+ hours.

Documentation: Tab 5 - Customer letter from AAA Flag & Banner Manufacturing Company Incorporated.

- Pacific Bell's poor OSS and LISC service cause CLC end-user customers to form a poor image of CLCs when reselling Pacific Bell loops. In fact, Sprint has filed an Advice Letter with the CPUC requesting to "grandfather" Pacific Bell resold local residential services.

Documentation: Tab 6 - Copy of Sprint Telecom. Ventures Advice Letter No. 44 and Statements of William Harrelson, counsel for MCI, and William Ettinger, counsel for AT&T, in IECs' complaint case against SBC/Pacific Bell explaining why IECs are no longer promoting resold services. AT&T Notice of Ex Parte Communication with CPUC, CPUC Case Numbers 96-12-026, 96-12-044, 97-02-021.



Steward Parkway
PO Box 641
San Francisco, CA 94117

Via Airborne Express
December 19, 1997

California Public Utilities Commission, PAL Coordinator
CACD Telecommunications Branch
505 Van Ness Avenue
San Francisco, CA 94102

RE: Sprint Telecommunications Venture (U-5552-C)
Advice Letter No. 44
Decision 96-02-072 Dated February 23, 1996

Dear Madam or Sir:

Enclosed for filing please find an original and four copies of revisions to Sprint Telecommunications Venture's (STV) Tariff. The revised tariff sheets issued in this filing are indicated on the following Check Sheet.

41st Revised Sheet No. 2-T

Sprint respectfully requests that these revisions become effective on December 27, 1997, pursuant to Decision 91-12-013 which allows for rate reductions, minor increases, and administrative changes to become effective on five days notice.

The purpose of this filing is to grandfather local residential service. As of December 27, 1997, local residential service will not be available to new customers.

Anyone may protest this advice letter to the California Public Utilities Commission. The protest must set forth the specific grounds on which it is based, including such items as financial and service impact. A protest must be made in writing and received within 20 days of the date this advice letter was filed with the Commission.

The address for mailing or delivering a protest to the Commission is:

Chief, CACD Telecommunications Branch
505 Van Ness Avenue, Room 3203
San Francisco, CA 94102

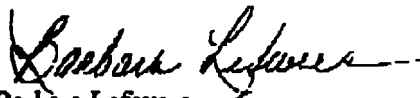
Advice Letter No. 44
December 19, 1997
Page 2

A copy must be mailed to the undersigned utility on the same date it is mailed or delivered to the Commission.

Acknowledgment and date of receipt are requested. A duplicate letter of transmittal is enclosed along with a self-addressed stamped envelope for this purpose.

If you have any questions, please contact me at 800/877-2643 or 913/624-6816.

Sincerely,



Barbara Lefevre
State Tariff Analyst
External Affairs

cc: Service List

1 that, largely, we agree that that is the way the matter
2 is ~~best~~ presented; to have rebuttal presented
3 separately. However, we have out-of-town witnesses and
4 they're going to present both their direct and rebuttal
5 at the same time, if that's all right with you.

6 ALJ WALKER: That's satisfactory.

7 That is all right with you,

8 Mr. Kolto-Wininger?

9 MR. KOLTO-WININGER: That's fine.

10 ALJ WALKER: Do the parties wish to make opening
11 statements before we call our first witness?

12 Mr. Harrelson, did you plan an opening
13 statement?

14 STATEMENT OF MR. HARRELSON

15 MR. HARRELSON: Just very briefly. I appreciate
16 that Commissioner Knight's in the room; the personal
17 interest you're showing in the case.

18 We are presenting evidence today that, from
19 MCI's perspective it's overwhelming evidence, that for
20 the two years past since Pacific Bell first began to
21 plan for the ordering process to support local services
22 resale in California, very little progress has been made
23 in terms of what it is CLECs and consumers need for
24 resale provisioning to work in California.

25 And those failures don't just relate to
26 complex systems that have to be worked out through
27 industry standard rules. Those failures pertain to
28 simple things like managing a staff, like having a

1 realistic forecast, like cooperating in terms of sharing
2 information that's essential to the preordering process
3 and the ordering process; a system in place which
4 systematically causes loss of dialtone, causes loss of
5 411 directory listings, and very recently as the
6 testimony reflects, and I think a very real concern,
7 loss of at least one 911 listing.

8 So I think I just want to emphasize the
9 importance of this matter. It is fundamental to the
10 legislatively-declared policy in this state that
11 consumers should have choice and they should have choice
12 in terms of quality services from multiple providers.

13 And so long as the state of affairs we
14 presently find ourselves in sustains itself, continues,
15 that legislatively-declared policy is being denied.
16 That's the California Legislature, not to mention U.S.
17 Congress who's basically also imposed on Pacific Bell an
18 obligation to support local services resale.

19 And the complaint really goes fundamentally to
20 the public's interest in competitive choice and
21 fundamentally to protecting the consumers' interest in
22 that legislatively-declared right.

23 It is so bad, your Honor, that frankly, the
24 evidence will show that MCI and AT&T simply ceased
25 selling their residential local service products.
26 We cannot any longer afford to suffer the harm to our
27 business reputation which the current state of affairs
28 has brought upon us. And we need this fixed as soon as

1 ALJ WALKER: The complaint alleges several
2 violations of FCC regulations.

3 Did you want the Commission to rule on whether
4 Pacific Bell has violated FCC regulations, and if so by
5 what authority would we do so?

6 MR. HARRELSON: Judge, could you give me a specific
7 reference, or can you -- I'm sorry; I don't have a --
8 can I take a moment off the record and get the
9 complaint?

10 ALJ WALKER: Well, it's on Count 3 of your
11 complaint.

12 But let me ask you, Mr. Harrelson, rather than
13 continue this, could you or Ms. Lee go through your
14 complaint and tomorrow or the next day give me a
15 document telling me which counts are now moot and are no
16 longer being pursued by MCI?

17 MR. HARRELSON: Yes.

18 ALJ WALKER: Good. Thank you.

19 Mr. Ettinger, did you wish to make an opening
20 statement?

21 STATEMENT OF MR. ETTINGER

22 MR. ETTINGER: Thank you, your Honor. I'll try not
23 to repeat anything Mr. Harrelson said.

24 It's not my intention with the opening
25 statement to summarize our testimony. You have that,
26 I believe; certainly you've read that. What I want to
27 do is reemphasize the importance of this case.

28 What we're dealing with here is a situation

1 ~~where~~ the California Commission on its own, through its
2 ~~own~~ rulings and through California statutes, mandated
3 local competition and mandated effective interfaces
4 between Pacific and the competitive local carriers and
5 created legal obligations on the part of Pacific to
6 facilitate that local exchange competition.

7 I don't think there's any question that that's
8 the ~~policy~~ policy of this state, and it was the policy of this
9 state even before the Telecommunications Act was passed
10 to have local competition in this state because it was
11 felt by the Commission after appropriate hearings and
12 considering arguments that that -- such competition was
13 truly in the best interest of the consumers of this
14 state.

15 Having made that decision, having placed
16 certain obligations on the part of Pacific Bell to have
17 effective interfaces with the competitive carriers for
18 the resale of local service so that we can at least have
19 the beginnings of local competition, Pacific was
20 obligated under California law, statute, and Commission
21 rules to live up to that.

22 The complaint of AT&T as well as the other
23 complaints and the interventions allege gross failures
24 on the part of Pacific Bell, failures which in toto
25 amount to a complete -- a virtually complete restriction
26 of local exchange competition in this state.

27 Very few numbers of orders are dribbling
28 through the process, and that's what this complaint is

1 about.

2 And unless this Commission orders Pacific Bell
3 to take certain affirmative steps to release that
4 bottleneck, to release that constriction, we will not
5 have local exchange competition in this state and the
6 losers will be the consumers of this state.

7 And I would only -- to contrast, if we don't
8 think there truly is a constriction in this case, what
9 Pacific can do on the one hand for inter- and intraLATA
10 PIC changes on behalf of its soon-to-be operational
11 affiliate PBCOM on the other hand what it can do for its
12 competitive CLCs.

13 I think it's clear, and I don't think Pacific
14 even contests the fact that it's going to be able to
15 handle something like 80 to 120,000 PIC change orders
16 per day when PBCOM gets into operation.

17 If PBCOM is successful in its marketing
18 efforts in convincing customers because of the price or
19 the quality of its service to shift away from AT&T, MCI
20 and Sprint or any other carriers and go to PBCOM for
21 interLATA service, PBCOM is not going to have any more
22 than the normal two- to three-day period to get those
23 customers switched over so that competition in the
24 interLATA market will -- which is already vibrant --
25 will continue, and as PBCOM suggests, perhaps become
26 more competitive.

27 But in the local exchange market, we have the
28 situation where competition is just being totally shut

1 down so that only several hundred orders a day can be
2 put through the process. And even as to those orders,
3 there's grave concerns about whether those orders are
4 being put through correctly in the sense of customers
5 being disconnected, customers losing features they
6 requested, customers not being properly listed in the
7 411 database and even -- I think I read in an MCI
8 rebuttal testimony -- a customer not correctly listed in
9 the E-911 database.

10 So what we have is a total -- almost complete
11 restriction of local exchange competition, which is
12 contrary to the obligations that Pacific had under
13 California law and Commission rules.

14 Thank you.

15 ALJ WALKER: Mr. Ettinger --

16 MR. ETTINGER: Yes, sir.

17 ALJ WALKER: -- do the workshops going on address
18 some of the technical problems that confront the parties
19 here?

20 MR. ETTINGER: There are workshops dealing with
21 long-term solutions, yes, your Honor.

22 ALJ WALKER: Are those ongoing now, or have they
23 come to a close?

24 MR. ETTINGER: I've just been told by Mr. Chang who
25 was working at those workshops that those have just
26 completed.

27 ALJ WALKER: Have they solved all of our problems,
28 Mr. Chang?

1 MR. CHANG: No, your Honor, they have not.

2 There are many things that are -- areas that
3 are still open, part of which are dependent on industry
4 standards being established from the Ordering and
5 Billing Forum, the OBF.

6 ALJ WALKER: Thank you.

7 Sprint, Ms. Van Dieen, did you wish to make an
8 opening statement?

9 STATEMENT OF MS. VAN DIEEN

10 MS. VAN DIEEN: Thank you, your Honor, just
11 briefly.

12 I'd like to -- Sprint supports the comments
13 made by MCI and AT&T and would like to reiterate those,
14 and emphasize for the Commission the importance of these
15 complaints to the development of local competition in
16 California.

17 As counsel for MCI indicated, MCI and AT&T
18 have had to curtail their efforts, and Sprint has also
19 had to curtail marketing efforts instead of moving
20 forward in its effort to actually cut back the numbers
21 of orders simply because existing levels aren't getting
22 through.

23 And it's just critical that the Commission
24 address the root cause of these problems so that
25 competition can develop.

26 Thank you.

27 ALJ WALKER: Thank you, Ms. Van Dieen.

28 Before I get to Pac Bell, are there opening

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

MCI Telecommunications Corporation)	
(U 5011 C))	
	Complainant	C. 96-12-026
V.)	
Pacific Bell (U 1001 C))	
	Defendant	
<hr/>		
AT&T Communications of California, Inc.)	
(U 5002 C))	
	Complainant	C. 96-12-044
V.)	
Pacific Bell (U 1001 C))	
	Defendant	
<hr/>		
NewTelco, L.P., dba Sprint)	
Telecommunications Venture (U 5552 C))	
and Sprint Telecommunications)	
Company, L.P. (U 5112 C))	
	Complainants	C. 97-02-021
V.)	
Pacific Bell (U 1001 C))	
	Defendant	
<hr/>		

NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 1.4 (a) of the Commission's Rules of Practice and Procedure, AT&T Communications of California, Inc. (U 5002 C) ("AT&T") hereby gives notice of the following *ex parte* communication:

The communication was initiated by AT&T, and took place during a meeting with Jose Jimenez, Commissioner Conlon's Advisor at 11:30 a.m. on May 13, 1997, at 505 Van Ness Avenue, San Francisco, California. Other participants included Rick Witherington, AT&T Government Affairs Vice President; and Randolph Deutsch, AT&T General Attorney.

During the meeting, Mr. Witherington expressed concern over Pacific Bell's plans to implement its "flow through" upgrade to the RMI/NDM on May 31, 1997. He explained that,

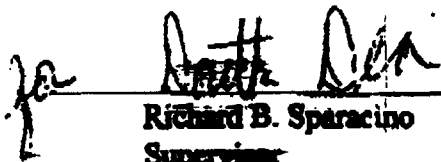
as recently as March 18, 1997, Pacific had assured AT&T that the upgrade would not affect existing NDM specifications for the CLCs. However, on April 23, Pacific proposed new RMI/NDM specifications that would require AT&T to make significant changes to its systems. AT&T was informed by Pacific that finalized specifications could be expected by May 15.

Mr. Witherington stated that the May 31 implementation as planned by Pacific Bell was inappropriate, noting that additional time would be required for AT&T to analyze the specifications and then implement the necessary coding changes to its systems. He warned that implementation of the modified upgrade on May 31 would seriously compromise AT&T's ability to process new local service customer orders, and that AT&T had requested that Pacific implement the flow through on May 31 in a manner that would be transparent to AT&T as previously committed. Written documentation regarding the upgrade was provided to Mr. Jimenez. [See attachments, confidential information excluded]

To obtain a copy of this notice, please contact:

Doretta Dea
AT&T Communications
795 Folsom Street, Room 285
San Francisco, CA 94107
(415) 442-2985
(415) 442-2357 (FAX)

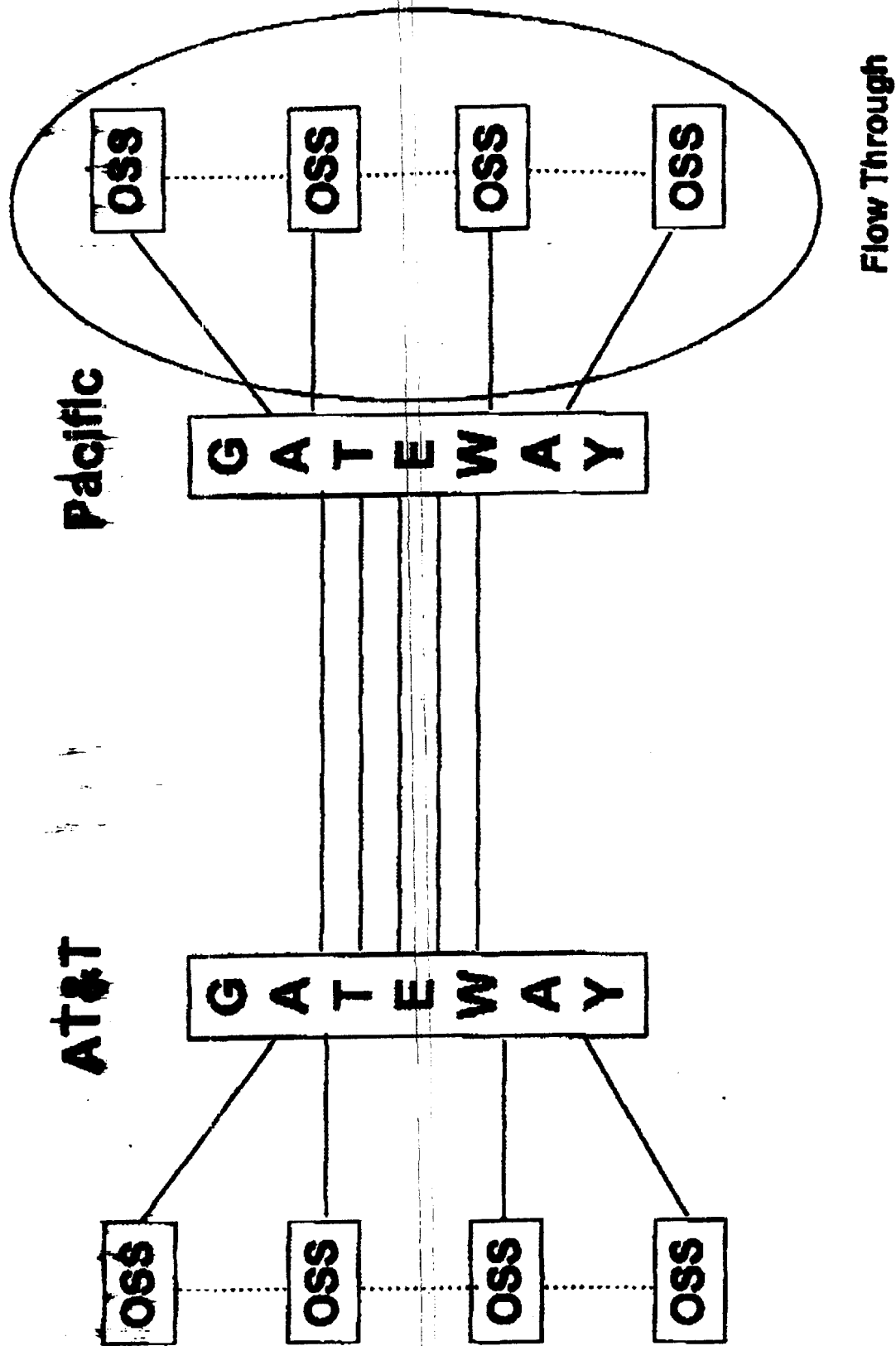
Respectfully submitted,



Richard B. Sparacino
Supervisor
AT&T Communications of
California, Inc.

May 15, 1997

Electronic Interfaces



Timeline

- 3/18** Pacific informed AT&T that "there are no changes to the existing interim electronic interface (NDM) specifications from a CLC perspective" that would result from the 5/31 OSS "flow through" release (Stankey letter to Collier)
- 4/23** Pacific Bell provides AT&T a 126 page set of specifications for the NDM/RMI interface "flow through" release on 5/31 that includes numerous changes that require changes by CLCs to their systems (Basic Exchange RMI Preparation Guide)
- 5/1** AT&T informs Pacific that the unilateral changes Pacific has proposed will significantly impact the orders that are moving over the interface, that they are unacceptable, and that Pacific must make the "flow through" implementation transparent to AT&T, as repeatedly promised orally and in writing. Any changes must be jointly agreed, Per Attachment 11, Appendix C of our Agreement. (Hedg-Peth letter to Bauman)
- 5/9** AT&T reiterates to Pacific that the proposed changes Pacific proposes to implement on 5/31 will render the interface inoperable without major changes by AT&T; that AT&T was not given sufficient time to modify its systems, especially given that the proposed changes will not be finalized until 5/15. AT&T asks Pacific to make all changes to implement "flow through" transparent consistent with prior commitments. AT&T informs Pacific it will need 3 weeks after specs finalized to determine the time needed to change its systems. (Collier letter to Corby)

A Devastating Impact on Local Competition

- **AT&T has already been forced to halt all consumer marketing for local service due to Pacific's severe capacity constraints**
- **AT&T's ability to process orders over the interface will be virtually nonexistent for several months if "flow through" upgrade implemented as proposed by Pacific**
 - **All business customer orders will reject**
 - **All new service and move orders will reject**
 - **All disconnect orders, migration w/ disconnect will reject**
 - **All orders w/ nontraditional addresses (e.g., no # or name) will reject**
 - **All handicap, remote access to call forwarding, and toll blocking feature orders will reject**

Proposed CPUC Action

- **Issue Assigned Commissioner's Ruling** requiring Pacific to implement "flow through" only upgrade on 5/31 in a manner that is transparent to CLCs as previously agreed.
- **If Pacific is not able to meet the 5/31 deadline**, require Pacific to maintain current system until it can reach agreement on final specifications and provides necessary lead time for all parties to implement and test the changes